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U.S. DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

PAUL SALADINO, MD.

Plaintiff,

vs.

FRANK TUFANO

FRANKIE'S FREE RANGE MEAT LLC

Defendants

Case No.: 6:20-CV-09346

MOTION TO DISMISS

1. The entity "Frankie's Free Range Meat LLC," was entered in to this lawsuit. At the time Frank Tufano's legal counsel did not properly advise him or make the correct court action.
2. This entity falls under Lack of Subject Matter Jurisdiction, as the business "Frankie's Free Range Meat LLC," has no relevancy to the matter at hand of trademark/defamation. There is no link of the activities of Frank Tufano's former business LLC to the current trademark and defamation issue.
3. Frank Tufano's statements, opinions, and videos have always been posted on his own personal social media pages, there is no such social media existing for the

1 York. The financial strain and pressure from various lawsuits, including this one,  
2 resulted in the business becoming financially crippled and being evicted from  
3 their New York location, which can be considered grounds for tortious  
4 interference.

- 5  
6 5. David D. Lin Esq. also failed to state a valid claim against the entity “Frankie’s  
7 Free Range Meat LLC,” as Frank Tufano associating with and promoting the  
8 business has nothing to do with Paul Saladino MD’s personal or business  
9 activities.

10 Dated: April 21, 2025

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12 By:           /s/ Frank Tufano          

13 Frank Tufano  
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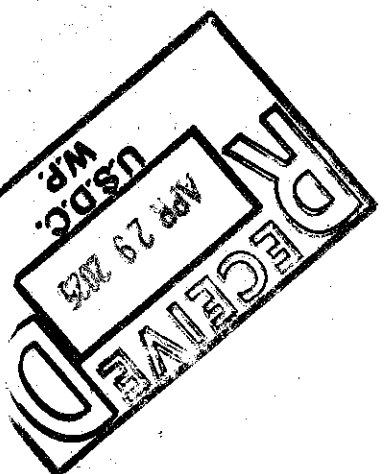
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